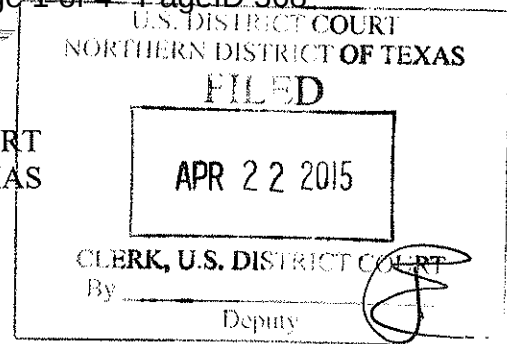


ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



TPG GLOBAL, LLC, a limited liability
company, et al.

Plaintiff,

v.

ADAM LEVINE, an individual.

Defendant.

Civil Action No.4:15-CV-00059-A

**STIPULATION AND [PROPOSED] ORDER
REGARDING UPCOMING DEADLINES**

WHEREAS, Defendant Adam Levine (“Levine”) has filed a motion to vacate the Court’s April 17, 2015 Order on Plaintiff’s Motion for Leave to File Second Amended Complaint (the “Motion to Vacate”); and

WHEREAS, the resolution the Motion to Vacate will necessarily determine whether Levine still intends to pursue his pending Motion to Dismiss for Want of Jurisdiction (the “Motion to Dismiss”); and

WHEREAS, while the Motion to Vacate is pending, other current deadlines may pass which affect both the Motion to Dismiss and any responsive pleading Levine may file in response to the Second Amended Complaint, which was filed and served on April 17, 2015; and

WHEREAS, the parties wish to avoid unnecessary waste to both the Court’s and the parties’ time and resources;

IT IS HEREBY STIPULATED AND AGREED, by the parties hereto, through their undersigned counsel, and subject to the approval of the Court, that:

1. The deadline for Plaintiffs to respond to the Motion to Dismiss shall be tolled until the Court decides the Motion to Vacate.

2. The deadline by which Levine must file a responsive pleading to the Second Amended Complaint shall also be tolled until the Court decides the Motion to Vacate.

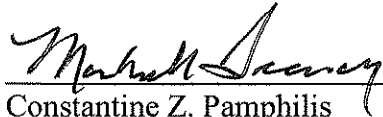
3. In the event the Court denies the Motion to Vacate, Levine agrees that the Motion to Dismiss shall be considered moot, and will file a new responsive pleading—asserting new Rule 12 motions, if any—directed at the Second Amended Complaint within fourteen (14) days following the entry of an order denying the Motion to Vacate.

4. In the event the Court grants the Motion to Vacate, Plaintiffs shall file a response to the Motion to Dismiss within seven (7) days following the entry of an order granting the Motion to Vacate.

SIGNED on this _____ day of _____ 2015.

JUDGE, U. S. DISTRICT COURT

AGREED AS TO FORM AND SUBSTANCE:



Constantine Z. Pamphilis
State Bar No. 00794419
KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP
700 Louisiana Street
Suite 2200
Houston, TX 77002
Telephone: (713) 220-8800
Facsimile: (713) 222-0843
dpamphilis@kasowitz.com

**ATTORNEY-IN-CHARGE
FOR PLAINTIFFS**

Marc E. Kasowitz
Admitted *Pro Hac Vice*
KASOWITZ, BENSON, TORRES &
FRIEDMAN LLP
1633 Broadway
New York, NY 10019
Telephone: (212) 506-1700
Facsimile: (212) 506-1800
mkasowitz@kasowitz.com

Marshall M. Searcy, Jr.
State Bar No. 17955500
KELLY HART & HALLMAN LLP
201 Main Street, Suite 2500
Fort Worth, Texas 76102
(817) 878-3512
Fax: (817) 878-9280
marshall.searcy@kellyhart.com



Joseph R. Knight
Texas Bar No. 11601275
LAW OFFICE OF JOSEPH R. KNIGHT
111 Congress Ave., Suite 2800
Austin, TX 78701
Telephone: (512) 457-0231
Facsimile: (512) 684-7681
jknight@knighttxlaw.com

ATTORNEY-IN-CHARGE
FOR DEFENDANT

James W. Morris
MORRIS, SCHORSCH & STAPLETON PC
8080 N. Central Expressway, Suite 1300
Dallas, TX 75206
Telephone: (214) 888-3324
Facsimile: (214) 888-3327
jmorris@msstxlaw.com